

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JULIAN SILVA, ET AL

Plaintiffs,

v.

JOSE VAZQUEZ COFRESI, ET AL

Defendants.

ECF CASE

Case No. 13-cv-3200-CM

**CONSENT MOTION FOR
PROTECTIVE ORDER**

JOSE VAZQUEZ

Counterclaimant,

v.

JULIAN SILVA

Counterclaim Defendant

Defendants JOSE VAZQUEZ COFRESI (“Vazquez”) , individually, and HANDLE WITH CARE PRODUCTIONS, INC. (“Handle With Care”) and Plaintiffs JULIAN SILVA, individually, and JULIAN SILVA, on behalf of HANDLE WITH CARE PRODUCTIONS, INC. hereby move this Court, pursuant to the Local Rules and this Court’s Individual Practices, for entry of the Stipulated Protective Order attached hereto.

Respectfully submitted:

Dated: September 16, 2013

/s/ Michael D. Steger

Michael D. Steger (MS2009)

Steger Krane LLP

Attorneys for Defendants

1601 Broadway, 12th Floor

New York, NY 10019

(212) 736-6800

(845) 689-2155 (fax)

msteger@skattorney.com

Attorneys for Defendants and Counterclaimant

CERTIFICATE OF SERVICE

I hereby certify that on this September 16, 2013 I served a true and correct copy of the attached Consent Motion for Protective Order electronically by ECF on counsel for all parties:

Peter C. Dee
Mavronicolas, Muller & Dee, LLP
950 Third Avenue, 10th Floor
New York, NY 10022
pdee@mavrolaw.com

/s/ Michael D. Steger
Michael D. Steger